

REMARKS

Claims 1-15 are pending in the application. Claims 1-9 and 11 have been amended, and claims 12-15 are newly added. Reconsideration of the rejection and allowance of the pending application in view of the following remarks are respectfully requested.

As an initial matter, Applicants would like to thank the Examiner for considering all of the documents cited in the Information Disclosure Statements filed on May 7, 2004 and May 10, 2005.

As another matter, Applicants note that the Examiner has not yet indicated whether the drawings filed on February 3, 2004 are acceptable. Applicants respectfully request that the Examiner indicate the acceptability of the drawings in the next Office communication.

Applicants also note that the Examiner has not yet acknowledged Applicants' claim for foreign priority, and receipt of the certified copy of the priority document. Applicants respectfully request that the Examiner acknowledge Applicants' claim for foreign priority and receipt of the certified copy of the priority document in the next Office communication.

In the Office Action, the Examiner rejected claims 1-5 and 8-11 under 35 U.S.C. § 103(a) as being unpatentable over Roh et al. (alternately translated as 'No et al.') (Korean Laid-open Patent Publication No. 10-2002-0047618) in view of Liebenow et al. (U.S. Patent No. 6,131,136). Applicants respectfully traverse the rejection for at least the following reasons.

In the specification of the present application, Applicants disclose an embodiment of a system for switching a communication mode of a detachable pad refrigerator which includes, inter alia, a client pad configured to detachably attach to an outer surface of the refrigerator, a communication module, and a refrigerator controller that controls the communication module to automatically switch the communication mode of the refrigerator with the client pad between a wired communication mode and a wireless communication mode according to whether the client pad is attached to the refrigerator. The system also includes a contact switch, provided at a location on the outer surface of the refrigerator, which senses whether the client pad is attached to the refrigerator. See, for example, Figures 4 and 5 of Applicants' drawings, and page, lines 3-6 of Applicants' specification.

In the Office Action, the Examiner appears to rely on only an English language of Roh et al. in rejecting the claims, as Roh et al. is written in the Korean language. According to the Abstract, Roh et al. is directed towards a refrigerator and a method for detachably attaching a touch screen on the refrigerator. In the Office Action, the Examiner acknowledges that Roh's Abstract does not disclose a refrigerator controller that controls a communication module to automatically switch a communication mode of the refrigerator with the touch screen between a wired communication mode and a wireless communication mode according to whether the touch screen is attached to the refrigerator. However, the Examiner asserts that Liebenow et al. teaches automatically switching between wireless and wired-based communication based upon the state of a wired connection, and asserts that, in view of the teaching of

Liebenow, it would have been obvious to modify the refrigerator disclosed in Roh's Abstract such that it automatically switches between wireless and wired communication based upon the state of a wired communication.

In addition to not disclosing the automatic communication mode switching discussed above, Applicants respectfully submit that Roh's Abstract also does not disclose a contact switch, provided at a location on the outer surface of the refrigerator, which senses whether the touch screen is attached to the refrigerator, as recited in Applicants' independent claim 1. Applicants respectfully submit that Liebenow also fails to disclose or suggest this feature.

Liebenow is directed towards a dual mode modem 100 for automatically selecting between wireless and wire-based communication modes, which includes mode selection circuitry 101. See col. 2, lines 50-55 of Liebenow. Liebenow discloses, at col. 3, lines 13-22, that the mode selection circuitry consists of detection circuitry 115 which signals switching circuitry 113 to couple input and output data lines to a wired interface 111, when the detection circuitry 115 detects that the modem 100 is attached to a wired-based communications network 105.

Applicants respectfully submit that Liebenow fails to disclose a contact switch, provided at a location of an outer surface of a refrigerator, which senses whether a client pad is attached to the refrigerator. Rather, Applicants submit Liebenow merely discloses a modem which includes detection circuitry 115 which detects the connection of a phone cord. See col. 3, lines 40-57 of Liebenow, for example.

Thus, Applicants respectfully submit that the combination of Roh's Abstract and Liebenow fails to disclose or suggest a system for switching a communication mode of a detachable pad refrigerator which includes a contact switch, provided at a location on an outer surface of the refrigerator, which senses whether a client pad is attached to the refrigerator, as recited in Applicants's independent claim 1.

Further, Applicants wish to point out that the contact switch discussed above was previously recited in dependent claim 2, which the Examiner rejected in view of the combination of Roh's Abstract and Liebenow. However, Applicants respectfully submit that the Office Action fails to specifically address this feature. Thus, Applicants respectfully submit that it would be improper for the Examiner to make the next Office Action final, as the Examiner has not established a *prima facie* case with respect to the contact switch recited in Applicants' claim 1.

Applicants also submit that the combination of Roh's Abstract and Liebenow fails to disclose or suggest a method for switching a communication mode of a detachable pad refrigerator which includes sensing whether a client pad is attached to the refrigerator according to and on/off state of a contact switch, enabling a wired communication module if it is sensed that the client pad is attached to the refrigerator, and enabling a wireless communication module if it is sensed that the client pad is not attached to the refrigerator, as recited in Applicants' independent claim 11.

For at least these reasons, Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection of independent claims 1 and 11 is improper, and

respectfully request the Examiner to withdraw the rejection and allow claims 1 and 11.

Dependent claims 2-5 and 8-10 are also submitted to be in condition for allowance for at least the reasons set forth above with respect to independent claim 1.

In the Office Action, the Examiner rejected claim 6 under 35 U.S.C. § 103(a) as being unpatentable over Roh et al. in view of Liebenow et al., and further in view of U.S. Patent No. 6,644,046 to Roh et al. (the '046 patent).

Applicants respectfully traverse the rejection for at least the following reasons.

Applicants respectfully submit that the '064 patent fails to overcome the above-noted deficiencies of Roh et al.'s English language Abstract and Liebenow. That is, Applicants respectfully submit that the combination of Roh et al.'s Abstract, Liebenow et al., and the '064 patent fails to disclose or suggest a system for switching a communication mode of a detachable pad refrigerator which includes a contact switch, provided at a location on an outer surface of the refrigerator, which senses whether a client pad is attached to the refrigerator, as recited in Applicants' independent claim 1.

For at least these reasons, Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection of claim 6, which depends from claim 1, is improper, and respectfully request the Examiner to withdraw the rejection and allow claim 6.

In the Office Action, the Examiner rejected claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Roh et al. in view of Liebenow et al., and further in view of Kang et al. (Korean Laid-open Patent Publication No. 10-2002-

0030222). Applicants respectfully traverse the rejection for at least the following reasons.

Applicants respectfully submit that the Kang et al. fails to overcome the above-noted deficiencies of Roh et al.'s English language Abstract and Liebenow. That is, Applicants respectfully submit that the combination of Roh et al.'s Abstract, Liebenow et al., and Kang et al. fails to disclose or suggest a system for switching a communication mode of a detachable pad refrigerator which includes a contact switch, provided at a location on an outer surface of the refrigerator, which senses whether a client pad is attached to the refrigerator, as recited in Applicants' independent claim 1.

For at least these reasons, Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection of claim 7, which depends from claim 1, is improper, and respectfully request the Examiner to withdraw the rejection and allow claim 7.

Applicants have added new claims 12-15 for the Examiner's consideration, of which claim 12 is independent. Claim 12 recites a system for switching a communication mode of a refrigerator which includes, *inter alia*, an attachment sensor, provided on the refrigerator, which senses whether a client pad is attached to the refrigerator, and a refrigerator controller that switches a communication module between a wired communication mode and a wireless communication mode based on an output of the attachment sensor. Applicants respectfully submit that the applied prior art fails to disclose or suggest this combination of features.

For at least this reason, Applicants respectfully submit that claim 12 is in condition for allowance, and request the Examiner to indicate such allowability.

Newly added dependent claims 14 and 15 recite that the refrigerator controller is configured to establish a connection between the client pad and a network, and maintain the connection between the client pad and the network when said refrigerator controller switches the communication mode of the communication module between said wired communication mode and said wireless communication mode. Applicants respectfully submit that the applied prior art fails to disclose this feature as well.

Thus, newly added dependent claims 13-15 are respectfully submitted to be in condition for allowance in view of their dependency on independent claims 1 and 12, and also in view of the features they individually recite.

Based on the above, it is respectfully submitted that this application is now in condition for allowance, and a Notice of Allowance is respectfully requested.

SUMMARY AND CONCLUSION

Entry and consideration of the present amendment, reconsideration of the outstanding Office Action, and allowance of the present application and all of the claims therein are respectfully requested and now believed to be appropriate. Applicants have made a sincere effort to place the present invention in condition for allowance and believe that they have now done so.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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